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CLERK OF COURT
NORTHERN DISTRICT OF ALABAMA

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

In re:

SHOOK & FLETCHER INSULATION
CO.,

Debtor.

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) Case Number 02-02771-BGC-11
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**MOTION FOR EXPEDITED HEARING ON
MOTION BY TRAVELERS CASUALTY AND
SURETY COMPANY TO COMPEL DISCOVERY**

Comes now Travelers Casualty & Surety Company ("Travelers") and moves this Court for an expedited hearing on its Motion by Travelers Casualty and Surety Company to Compel Discovery ("Motion to Compel") filed simultaneously herewith, and in so doing would show the Court the following:

1. On July 12, 2002, Travelers filed its Motion to Compel seeking full and complete production from the Debtor of the following: (i) all contingency fee agreements that either Scott D. Gilbert ("Mr. Gilbert") or Gilbert, Heintz & Randolph ("GHR") has made in other cases in which the asbestos nonproducts coverage issue is presented; (ii) records of all payments made by Shook to Mr. Gilbert's law firm; (iii) all coverage analyses of GHR regarding Shook and related documentation, and all communications between GHR and Shook regarding the issues on which Shook has asked Mr. Gilbert to testify; and (iv) all data that Mr. Gilbert has consulted or will consult in formulating his expert opinion.

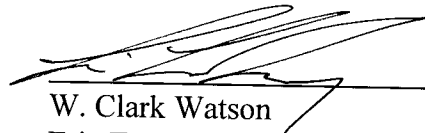
2. Due to the expedited time periods under which the above-referenced case is proceeding, Travelers respectfully requests that this Court conduct an expedited hearing on

Travelers' Motion to Compel. Furthermore, Travelers submits that if this Court grants its request for an expedited hearing, an appropriate and convenient time for the hearing would be at the same time as the Pretrial Conference currently set on July 17, 2002 at 9:00 a.m.

3. Attached hereto as **Exhibit "A"** is a proposed Order granting this motion.

WHEREFORE, PREMISES CONSIDERED, Travelers respectfully requests that this Court schedule a hearing on an expedited basis on its Motion to Compel and grant such further relief as this Court deems appropriate.

Respectfully submitted, the 12 day of July, 2002.



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EXHIBIT “A”

CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of the foregoing on

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by facsimile and/or by hand delivery on this the 12 day of July, 2002.


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